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CITY OF ANAHEIM, JORGE
CISNEROS, PAUL DELGADO, BRETT
HEITMAN, KENNETH WEBER, and
CATALIN PANOV

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANTONIO LOPEZ, individually;
JOHANNA LOPEZ, individually; M.R.,
by and through his guardian ad litem,
April Rodriguez, individually and as
successor in interest to Brandon Lopez;
B.L. and J.L., by and through their
guardian ad litem Rachel Perez,
individually and as successor in interest
to Brandon Lopez; S.L., by and through
his guardian ad litem, Rocio Flores,
individually and as successor in interest
to Brandon Lopez,

Plaintiffs,

vs.

CITY OF ANAHEIM; CITY OF
SANTA ANA; DAVID VALENTIN;
JORGE CISNEROS; PAUL
DELGADO; BRETT HEITMAN;
KENNETH WEBER; CAITLIN
PANOV; DOES 1-10,

Defendants.

Case No. 8:22-cv-1351-JVS-ADS
[Hon. James V. Selna, Dist. Judge; Hon.
Autumn D. Spaeth, M. Judge]

**DEFENDANTS' RESPONSE TO
PLAINTIFFS' STATEMENT OF
EVIDENTIARY OBJECTIONS**

*Filed Concurrently with Reply in
Support of Motion for Summary
Judgment; Response to Plaintiffs'
Statements of Genuine Disputes of
Material Fact and Additional Material
Facts; Defendants' Evidentiary
Objections*

Date: August 12, 2024

Time: 1:30 p.m.

Crtrm.: 10C

FPTC Date: September 9, 2024

Trial Date: September 17, 2024

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

Defendants CITY OF ANAHEIM, JORGE CISNEROS, PAUL DELGADO, BRETT HEITMAN, KENNETH WEBER, and CATALIN PANOV hereby submit the following Response to Plaintiffs’ Statement of Evidentiary Objections in Support of their Opposition to Defendants’ Motion for Summary Judgment. [Dkt. 130-3.]

Defendants’ Evidence	Plaintiffs’ Objection	Defts.’ Response
1. Exh. 1, Composite Video	<p>FRE 403 – cumulative and unduly prejudicial</p> <p>FRE 801, 802.</p> <p>FRE 1002 at to the transcript.</p> <p>Fed. R. Civ. P. Rule 37(c)(1); <i>Algaier v. Bank of America, N.A.</i>, 2015 WL 5944177 at *6-7 (excluding five exhibits submitted in support of the plaintiff’s opposition to summary judgment because the exhibits were not produced in discovery in violation of Rule 37, and there was no substantial justification for doing so); <i>Chisolm v. 7-Eleven, Inc.</i>, 383 F.Supp.3d 1032, 1044-45 (S.D. Cal. 2019) (excluding email submitted by the plaintiff in support of opposition to motion for summary judgment</p>	<p>Plaintiffs fail to provide any basis for their allegation that the Composite Video is unduly prejudicial. Further, the Composite Video is not duplicative, but appropriately provides the finder of fact in this matter with all video footage incident played simultaneously ,the same video footage used by Plaintiffs themselves as evidence.</p> <p>Additionally, Plaintiffs do not provide any evidence that such Composite Video includes hearsay.</p> <p>Finally, as stated in the McLaughlin Declaration filed in support of Defendants’ Motion</p>

1	Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
2		since the email was not	for Summary
3		produced in discovery,	Judgment ("MSJ"),
4		and failure to produce	the Composite Video
5		was not justified).	was timely and
6			appropriately
7			produced to
8			Plaintiffs with
9			Defendants'
10			Supplemental Expert
11	2. Exh 2, Audio Interview of	FRE 403 – cumulative	Plaintiffs fail to
12	Anaheim Police Investigator	and unduly prejudicial.	provide any basis for
13	Ricky Reynoso ("Reynoso	FRE 701.	their allegation that
14	Interview")		the Reynoso
15	Exh. 19, Transcript of Interview	FRE 801, 802.	Interview is unduly
16	of Anaheim Police Investigator		prejudicial.
17	Ricky Reynoso ("Reynoso	FRE 1002 as to the	Additionally, neither
18	Interview Transcript").	transcript.	of these exhibits are
19		Fed. R. Civ. P Rule	cumulative – the
20		37(c)(1) <i>Algaier v.</i>	transcript of the
21		<i>Bank of America, N.A.</i> ,	Reynoso Interview
22		2015 WL 5944177 at	was included for the
23		*6-7 (excluding five	Court's ease.
24		exhibits submitted in	
25		support of the	Plaintiffs fail to
26		plaintiff's opposition to	identify any specific
27		summary judgment	hearsay in the
28		because the exhibits	Reynoso Interview.
		were not produced in	
		discovery in violation	Plaintiffs' objection
		of Rule 37, and there	on the basis that the
		was no substantial	transcript is not
		justification for doing	original is
		so); <i>Chisolm v. 7-</i>	nonsensical, as the
		<i>Eleven, Inc.</i> , 383	transcript is just a

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Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
	F.Supp.3d 1032, 1044-45 (S.D. Cal. 2019) (excluding email submitted by the plaintiff in support of opposition to motion for summary judgment since the email was not produced in discovery, and failure to produce was not justified).	recording of the Reynoso Interview. Defendants did not fail to provide information in the discovery stage. The Reynoso Interview was identified on Defendant City of Anaheim's Initial Disclosures on or about October 10, 2022 and Plaintiffs failed to raise any timely objection regarding Defendants' responses to written discovery. [See Dkt. 129-2 at ¶4.]
3. Exh. 3, Audio Interview of Santa Ana Police Department Officer Kenny Aguilar ("Aguilar Interview") Exh. 20, Transcript of Interview of Santa Ana Police Department Officer Kenny Augilar ("Aguilar Interview Transcript")	FRE 403 – cumulative and unduly prejudicial. FRE 701. FRE 801, 802. FRE 1002 as to the transcript. Fed. R. Civ. P Rule 37(c)(1) <i>Algaier v. Bank of America, N.A.</i> , 2015 WL 5944177 at *6-7 (excluding five exhibits submitted in support of the plaintiff's opposition to	Plaintiffs fail to provide any basis for their allegation that the Aguilar Interview is unduly prejudicial. Additionally, neither of these exhibits are cumulative – the transcript of the Aguilar Interview was included for the Court's ease. Plaintiffs fail to identify any specific

1	Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
2		summary judgment	hearsay in the
3		because the exhibits	Aguilar Interview.
4		were not produced in	Plaintiffs' objection
5		discovery in violation	on the basis that the
6		of Rule 37, and there	transcript is not
7		was no substantial	original is
8		justification for doing	nonsensical, as the
9		so); <i>Chisolm v. 7-</i>	transcript is just a
10		<i>Eleven, Inc.</i> , 383	recording of the
11		F.Supp.3d 1032, 1044-	Aguilar Interview.
12		45 (S.D. Cal. 2019)	Defendants did not
13		(excluding email	fail to provide
14		submitted by the	information in the
15		plaintiff in support of	discovery stage. The
16		opposition to motion	Aguilar Interview
17		for summary judgment	was identified on
18		since the email was not	Defendant City of
19		produced in discovery,	Anaheim's Initial
20		and failure to produce	Disclosures on or
21		was not justified).	about October 10,
22			2022 and Plaintiffs
23			failed to raise any
24			timely objection
25			regarding
26			Defendants'
27			responses to written
28			discovery. [See Dkt.
			129-2 at ¶5.]
			Additionally, of
			note, Plaintiffs
			themselves cite to
			this exhibit in
			support of their
			purported dispute of
			Defendants' SUF
			No. 14.

1	Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
2	4. Exh. 15, Audio Interview of	FRE 403 – cumulative	Plaintiffs fail to
3	Defendant Sergeant Paul Delgado	and unduly prejudicial.	provide any basis for
4	("Delgado Interview")	FRE 701.	their allegation that
5	Exh. 21, Transcript of Audio	FRE 801, 802.	the Delgado
6	Interview of Defendant Sergeant	FRE 1002 as to the	Interview is unduly
7	Paul Delgado ("Delgado	transcript.	prejudicial.
8	Interview Transcript")	Fed. R. Civ. P Rule	Additionally, neither
9		37(c)(1) <i>Algaier v.</i>	of these exhibits are
10		<i>Bank of America, N.A.</i> ,	cumulative – the
11		2015 WL 5944177 at	transcript of the
12		*6-7 (excluding five	Delgado Interview
13		exhibits submitted in	was included for the
14		support of the	Court's ease.
15		plaintiff's opposition to	Plaintiffs fail to
16		summary judgment	identify any specific
17		because the exhibits	hearsay in the
18		were not produced in	Delgado Interview.
19		discovery in violation	Plaintiffs' objection
20		of Rule 37, and there	on the basis that the
21		was no substantial	transcript is not
22		justification for doing	original is
23		so); <i>Chisolm v. 7-</i>	nonsensical, as the
24		<i>Eleven, Inc.</i> , 383	transcript is just a
25		F.Supp.3d 1032, 1044-	recording of the
26		45 (S.D. Cal. 2019)	Delgado Interview.
27		(excluding email	Defendants did not
28		submitted by the	fail to provide
		plaintiff in support of	information in the
		opposition to motion	discovery stage. The
		for summary judgment	Delgado Interview
		since the email was not	was identified on
		produced in discovery,	Defendant City of
		and failure to produce	Anaheim's Initial
		was not justified).	Disclosures on or
			about October 10,
			2022 and Plaintiffs

1	Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
2			failed to raise any
3			timely objection
4			regarding
5			Defendants'
6			responses to written
7			discovery. [See Dkt.
8			129-2 at ¶17.]
9	5. Exh. 5, Audio Interview of	FRE 403 – cumulative	Plaintiffs fail to
10	Defendant Sergeant Kenneth	and unduly prejudicial.	provide any basis for
11	Weber ("Weber Interview")	FRE 701.	their allegation that
12			the Weber Interview
13	Exh. 22, Transcript of Audio	FRE 801, 802.	is unduly prejudicial.
14	Interview of Defendant Sergeant		Additionally, neither
15	Kenneth Weber ("Weber	FRE 1002 as to the	of these exhibits are
16	Interview Transcript")	transcript.	cumulative – the
17		Fed. R. Civ. P Rule	transcript of the
18		37(c)(1) <i>Algaier v.</i>	Weber Interview
19		<i>Bank of America, N.A.</i> ,	was included for the
20		2015 WL 5944177 at	Court's ease.
21		*6-7 (excluding five	Plaintiffs fail to
22		exhibits submitted in	identify any specific
23		support of the	hearsay in the Weber
24		plaintiff's opposition to	Interview.
25		summary judgment	Plaintiffs' objection
26		because the exhibits	on the basis that the
27		were not produced in	transcript is not
28		discovery in violation	original is
		of Rule 37, and there	nonsensical, as the
		was no substantial	transcript is just a
		justification for doing	recording of the
		so); <i>Chisolm v. 7-</i>	Weber Interview.
		<i>Eleven, Inc.</i> , 383	
		F.Supp.3d 1032, 1044-	Defendants did not
		45 (S.D. Cal. 2019)	fail to provide
		(excluding email	information in the
		submitted by the	discovery stage. The
		plaintiff in support of	

1	Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
2		opposition to motion	Weber Interview
3		for summary judgment	was identified on
4		since the email was not	Defendant City of
5		produced in discovery,	Anaheim's Initial
6		and failure to produce	Disclosures on or
7		was not justified).	about October 10,
8			2022 and Plaintiffs
9			failed to raise any
10			timely objection
11			regarding
12			Defendants'
13			responses to written
14			discovery. [See Dkt.
15			129-2 at ¶7.]
16			
17			Additionally, of
18			note, Plaintiffs
19			themselves cite to
20			this exhibit in
21			support of their
22			purported dispute of
23			Defendants' SUF
24			No. 17.
25	6. Exh. 14, Audio Interview of	FRE 403 – cumulative	Plaintiffs fail to
26	Defendant Officer Catalin Panov	and unduly prejudicial.	provide any basis for
27	("Panov Interview")	FRE 701.	their allegation that
28		FRE 801, 802.	the Panov Interview
	Transcript of Audio Interview of	FRE 1002 as to the	is unduly prejudicial.
	Defendant Officer Catalin Panov	transcript.	Additionally, neither
	("Panov Interview Transcript")		of these exhibits are
		Fed. R. Civ. P Rule	cumulative – the
		37(c)(1) <i>Algaier v.</i>	transcript of the
		<i>Bank of America, N.A.</i> ,	Panov Interview was
		2015 WL 5944177 at	included for the
		*6-7 (excluding five	Court's ease.
		exhibits submitted in	Plaintiffs fail to
			identify any specific

1	Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
2		support of the	hearsay in the Panov
3		plaintiff's opposition to	Interview.
4		summary judgment	Plaintiffs' objection
5		because the exhibits	on the basis that the
6		were not produced in	transcript is not
7		discovery in violation	original is
8		of Rule 37, and there	nonsensical, as the
9		was no substantial	transcript is just a
10		justification for doing	recording of the
11		so); <i>Chisolm v. 7-</i>	Panov Interview.
12		<i>Eleven, Inc.</i> , 383	
13		F.Supp.3d 1032, 1044-	Defendants did not
14		45 (S.D. Cal. 2019)	fail to provide
15		(excluding email	information in the
16		submitted by the	discovery stage. The
17		plaintiff in support of	Panov Interview was
18		opposition to motion	identified on
19		for summary judgment	Defendant City of
20		since the email was not	Anaheim's Initial
21		produced in discovery,	Disclosures on or
22		and failure to produce	about October 10,
23		was not justified).	2022 and Plaintiffs
24			failed to raise any
25			timely objection
26			regarding
27			Defendants'
28			responses to written
			discovery. [See Dkt.
			129-2 at ¶16.]
23	7. Exh. 6, Audio Interview of	FRE 403 – cumulative	Plaintiffs fail to
24	Santa Ana Police Department	and unduly prejudicial.	provide any basis for
25	Officer Sergio Martinez	FRE 701.	their allegation that
26	("Martinez Interview")	FRE 801, 802.	the Martinez
27	Exh. 24, Transcript of Interview		Interview is unduly
28	of Santa Ana Police Department		prejudicial.
			Additionally, neither
			of these exhibits are

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Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
Officer Sergio Martinez ("Martinez Interview Transcript")	FRE 1002 as to the transcript. Fed. R. Civ. P Rule 37(c)(1) <i>Algaier v. Bank of America, N.A.</i> , 2015 WL 5944177 at *6-7 (excluding five exhibits submitted in support of the plaintiff's opposition to summary judgment because the exhibits were not produced in discovery in violation of Rule 37, and there was no substantial justification for doing so); <i>Chisolm v. 7-Eleven, Inc.</i> , 383 F.Supp.3d 1032, 1044-45 (S.D. Cal. 2019) (excluding email submitted by the plaintiff in support of opposition to motion for summary judgment since the email was not produced in discovery, and failure to produce was not justified).	cumulative – the transcript of the Martinez Interview was included for the Court's ease. Plaintiffs fail to identify any specific hearsay in the Martinez Interview. Plaintiffs' objection on the basis that the transcript is not original is nonsensical, as the transcript is just a recording of the Martinez Interview. Defendants did not fail to provide information in the discovery stage. The Martinez Interview was identified on Defendant City of Anaheim's Initial Disclosures on or about October 10, 2022 and Plaintiffs failed to raise any timely objection regarding Defendants' responses to written discovery. [See Dkt. 129-2 at ¶8.]

1	Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
2	8. Exh. 7, Audio Interview of	FRE 403 – cumulative	Plaintiffs fail to
3	Santa Ana Police Department	and unduly prejudicial.	provide any basis for
4	Corporal Luis Galeana (“Galeana	FRE 701.	their allegation that
5	Interview”)		the Galeana
6	Exh. 25, Transcript of Interview	FRE 801, 802.	Interview is unduly
7	of Santa Ana Police Department	FRE 1002 as to the	prejudicial.
8	Corporal Luis Galeana (“Galeana	transcript.	Additionally, neither
9	Interview Transcript”)		of these exhibits are
10		Fed. R. Civ. P Rule	cumulative – the
11		37(c)(1) <i>Algaier v.</i>	transcript of the
12		<i>Bank of America, N.A.</i> ,	Galeana Interview
13		2015 WL 5944177 at	was included for the
14		*6-7 (excluding five	Court’s ease.
15		exhibits submitted in	
16		support of the	Plaintiffs fail to
17		plaintiff’s opposition to	identify any specific
18		summary judgment	hearsay in the
19		because the exhibits	Galeana Interview.
20		were not produced in	
21		discovery in violation	Plaintiffs’ objection
22		of Rule 37, and there	on the basis that the
23		was no substantial	transcript is not
24		justification for doing	original is
25		so); <i>Chisolm v. 7-</i>	nonsensical, as the
26		<i>Eleven, Inc.</i> , 383	transcript is just a
27		F.Supp.3d 1032, 1044-	recording of the
28		45 (S.D. Cal. 2019)	Galeana Interview.
		(excluding email	
		submitted by the	Defendants did not
		plaintiff in support of	fail to provide
		opposition to motion	information in the
		for summary judgment	discovery stage. The
		since the email was not	Galeana Interview
		produced in discovery,	was identified on
		and failure to produce	Defendant City of
		was not justified).	Anaheim’s Initial
			Disclosures on or
			about October 10,
			2022 and Plaintiffs

1	Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
2			failed to raise any
3			timely objection
4			regarding
5			Defendants'
6			responses to written
7			discovery. [See Dkt.
8			129-2 at ¶9.]
9	9. Exh. 13, Audio Interview of Defendant Officer Brett Heitman ("Heitman Interview")	FRE 403 – cumulative and unduly prejudicial.	Plaintiffs fail to provide any basis for their allegation that the Heitman
10	Exh. 26, Transcript of Interview of Defendant Officer Brett Heitman ("Heitman Interview Transcript")	FRE 701.	Interview is unduly
11		FRE 801, 802.	prejudicial.
12		FRE 1002 as to the transcript.	Additionally, neither of these exhibits are
13			cumulative – the
14		Fed. R. Civ. P Rule 37(c)(1) <i>Algaier v. Bank of America, N.A.</i> , 2015 WL 5944177 at *6-7 (excluding five exhibits submitted in support of the plaintiff's opposition to summary judgment because the exhibits were not produced in discovery in violation of Rule 37, and there was no substantial justification for doing so); <i>Chisolm v. 7-Eleven, Inc.</i> , 383 F.Supp.3d 1032, 1044-45 (S.D. Cal. 2019) (excluding email submitted by the plaintiff in support of	transcript of the Heitman Interview was included for the Court's ease.
15			Plaintiffs fail to identify any specific hearsay in the Heitman Interview.
16			Plaintiffs' objection on the basis that the transcript is not original is nonsensical, as the transcript is just a recording of the Heitman Interview.
17			Defendants did not fail to provide information in the
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Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
	opposition to motion for summary judgment since the email was not produced in discovery, and failure to produce was not justified).	discovery stage. The Heitman Interview was identified on Defendant City of Anaheim's Initial Disclosures on or about October 10, 2022 and Plaintiffs failed to raise any timely objection regarding Defendants' responses to written discovery. [See Dkt. 129-2 at ¶15.]
10. Exh. 9, Audio Interview of Anaheim Police Officer Brandon Mullins ("Mullins Interview") Exh. 27, Transcript of Interview of Anaheim Police Officer Brandon Mullins ("Mullins Interview Transcript")	FRE 403 – cumulative and unduly prejudicial. FRE 701. FRE 801, 802. FRE 1002 as to the transcript. Fed. R. Civ. P Rule 37(c)(1) <i>Algaier v. Bank of America</i> , N.A., 2015 WL 5944177 at *6-7 (excluding five exhibits submitted in support of the plaintiff's opposition to summary judgment because the exhibits were not produced in discovery in violation of Rule 37, and there was no substantial	Plaintiffs fail to provide any basis for their allegation that the Mullins Interview is unduly prejudicial. Additionally, neither of these exhibits are cumulative – the transcript of the Mullins Interview was included for the Court's ease. Plaintiffs fail to identify any specific hearsay in the Mullins Interview. Plaintiffs' objection on the basis that the transcript is not original is

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Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
	justification for doing so); <i>Chisolm v. 7-Eleven, Inc.</i> , 383 F.Supp.3d 1032, 1044-45 (S.D. Cal. 2019) (excluding email submitted by the plaintiff in support of opposition to motion for summary judgment since the email was not produced in discovery, and failure to produce was not justified).	nonsensical, as the transcript is just a recording of the Mullins Interview. Defendants did not fail to provide information in the discovery stage. The Mullins Interview was identified on Defendant City of Anaheim's Initial Disclosures on or about October 10, 2022 and Plaintiffs failed to raise any timely objection regarding Defendants' responses to written discovery. [See Dkt. 129-2 at ¶11.]
11. Exh. 8, Audio Interview of Santa Ana Police Officer Nelson Menendez ("Menendez Interview") Exh. 28, Transcript of Interview of Santa Ana Police Officer Nelson Menendez ("Officer Menendez Interview Transcript")	FRE 403 – cumulative and unduly prejudicial. FRE 701. FRE 801, 802. FRE 1002 as to the transcript. Fed. R. Civ. P Rule 37(c)(1) <i>Algaier v. Bank of America, N.A.</i> , 2015 WL 5944177 at *6-7 (excluding five exhibits submitted in	Plaintiffs fail to provide any basis for their allegation that the Menendez Interview is unduly prejudicial. Additionally, neither of these exhibits are cumulative – the transcript of the Menendez Interview was included for the Court's ease.

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Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
	support of the plaintiff's opposition to summary judgment because the exhibits were not produced in discovery in violation of Rule 37, and there was no substantial justification for doing so); <i>Chisolm v. 7-Eleven, Inc.</i> , 383 F.Supp.3d 1032, 1044-45 (S.D. Cal. 2019) (excluding email submitted by the plaintiff in support of opposition to motion for summary judgment since the email was not produced in discovery, and failure to produce was not justified).	<p>Plaintiffs fail to identify any specific hearsay in the Menendez Interview.</p> <p>Plaintiffs' objection on the basis that the transcript is not original is nonsensical, as the transcript is just a recording of the Menendez Interview.</p> <p>Defendants did not fail to provide information in the discovery stage. The Menendez Interview was identified on Defendant City of Anaheim's Initial Disclosures on or about October 10, 2022 and Plaintiffs failed to raise any timely objection regarding Defendants' responses to written discovery. [See Dkt. 129-2 at ¶10.]</p>

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Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
<p>12. Exh. 10, Audio Interview of Anaheim Police Officer James Lopez ("Officer Lopez Interview")</p> <p>Exh. 29, Transcript of Interview of Anaheim Police Officer James Lopez ("Officer Lopez Interview Transcript")</p>	<p>FRE 403 – cumulative and unduly prejudicial.</p> <p>FRE 701.</p> <p>FRE 801, 802.</p> <p>FRE 1002 as to the transcript.</p> <p>Fed. R. Civ. P Rule 37(c)(1) <i>Algaier v. Bank of America, N.A.</i>, 2015 WL 5944177 at *6-7 (excluding five exhibits submitted in support of the plaintiff's opposition to summary judgment because the exhibits were not produced in discovery in violation of Rule 37, and there was no substantial justification for doing so); <i>Chisolm v. 7-Eleven, Inc.</i>, 383 F.Supp.3d 1032, 1044-45 (S.D. Cal. 2019) (excluding email submitted by the plaintiff in support of opposition to motion for summary judgment since the email was not produced in discovery, and failure to produce was not justified).</p>	<p>Plaintiffs fail to provide any basis for their allegation that the Lopez Interview is unduly prejudicial. Additionally, neither of these exhibits are cumulative – the transcript of the Lopez Interview was included for the Court's ease.</p> <p>Plaintiffs fail to identify any specific hearsay in the Lopez Interview.</p> <p>Plaintiffs' objection on the basis that the transcript is not original is nonsensical, as the transcript is just a recording of the Lopez Interview.</p> <p>Defendants did not fail to provide information in the discovery stage. The Lopez Interview was identified on Defendant City of Anaheim's Initial Disclosures on or about October 10, 2022 and Plaintiffs failed to raise any</p>

Defendants' Evidence	Plaintiffs' Objection	Defts.' Response
		timely objection regarding Defendants' responses to written discovery. [See Dkt. 129-2 at ¶12.]

DATED: July 29, 2024

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Abigail J.R. McLaughlin
DANA A. FOX
TONY M. SAIN
TORI L. N. BAKKEN
ABIGAIL J.R. McLAUGHLIN
Attorneys for Defendants,
CITY OF ANAHEIM, JORGE
CISNEROS, PAUL DELGADO, BRETT
HEITMAN, KENNETH WEBER, and
CATALIN PANOV